Interstate Brands Corporation
York County
Biddeford, Maine
A-732-71-D-N

Departmental
Findings of Fact and Order
Air Emission License
After-the-Fact

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Interstate Brands Corporation (IBC) of Biddeford, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their bakery.

B. Emission Equipment
IBC is licensed to operate the following equipment:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type, % sulfur	Stack #
Boiler #1	8.4	8,400	NG or propane, negligible	A
Boiler #2	8.4	8,400	NG or propane, negligible	A
Make-up Air #1	5.0	5,000	NG or propane, negligible	-
Make-up Air #2	5.0	5,000	NG or propane, negligible	-
Make-up Air #3	5.0	5,000	NG or propane, negligible	-
Make-up Air #4	5.0	5,000	NG or propane, negligible	-
Make-up Air #5	5.0	5,000	NG or propane, negligible	-
Make-up Air #6	10.0	10,000	NG or propane, negligible	-
Make-up Air #7	10.0	10,000	NG or propane, negligible	-
Make-up Air #8	3.0	3,000	NG or propane, negligible	-
Make-up Air #9	5.4	5,400	NG or propane, negligible	-

Process Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (CF/hr)	Fuel Type	Production Rate (ton/hr)	Pollution Control Equipment	Stack #
Bread Oven #1	9.2	9,200	natural gas	8.2	catalytic oxidizer #1	O1
Bread Oven #2	7.6	7,600	natural gas	8.9	catalytic oxidizer #2	O2
Bun Oven	6.9	6,900	natural gas	4.4	catalytic oxidizer #2	O2
English Muffin Griddle	1.4	1,400	natural gas	1.6	none	EM
Cake Line Oven	3.3	3,300	natural gas	-	none	CO
Donut Fryers #1	1.3	1,300	natural gas	-	none	D1
Donut Fryers #2	1.3	1,300	natural gas	-	none	D2

Miscellaneous Equipment and Sources

Equipment
Two Parts Washers
Chain Lubricating Oil
Videojet Printer Ink

IBC has additional equipment including a diesel storage tank which are considered insignificant activities and are mentioned here for inventory purposes only.

C. Application Classification

The previous air emission license for IBC expired on June 19, 2003. A complete application was not submitted on time, therefore IBC is considered to be an existing source applying for an after-the-fact renewal. The facility is determined to be a minor source and the application has been processed through Chapter 115 of the Department's regulations.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for an after-the-fact renewal requires an analysis similar to a Best Available Control Technology analysis per Chapter 115 of the Department's regulations.

B. Process Description

IBC operates a bakery which consists of two high speed bread lines, a high speed bun line, English muffin griddle, cake oven, donut fryers, pie fryer (insignificant source), nine make-up air heaters and two gas/ propane fired boilers. Fugitive emission sources include videojet printers, lubricating oil used for the oven chains, and parts washers used in the bakery maintenance and garage areas.

The boilers provide heat and hot water to the facility and steam for production use. Bakery production equipment includes both yeast and chemically leavened product lines.

Ethanol, a VOC, is produced as a result of baking yeast-leavened breads, where yeast metabolizes with sugars in an anaerobic fermentation producing ethanol. Ethanol remains in a liquid state in the bread through the prebaking process, and when exposed to high temperatures through baking, ethanol vapor is emitted from the bread. The chemically leavened products have no ethanol production and no significant VOC emissions.

C. Boilers

Boilers #1 and #2 each have a maximum design heat input capacity of 8.4 MMBtu/hr and fire natural gas with propane as backup.

Boilers #1 and #2 each have maximum heat inputs less than 10 MMBtu/hr and are therefore not subject to the New Source Performance Standards (NSPS) Subpart Dc for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

A summary of the BPT analysis for Boilers #1 and #2 is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane), based on a thirteen 4-week rolling total.
2. Chapter 103 regulates PM emissions, however in this case a BPT analysis for PM determined a more stringent limit of 0.05 lb/MMBtu was appropriate and shall be used. The PM_{10} limits are derived from the PM limits.
3. NO_x, CO and VOC emission limits are based upon AP-42 data dated 2/98.
4. Visible emissions from the boilers shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

D. Make-up Air Handling Units

The make-up air handling units include five units at 5.0 MMBtu/hr, two units at 10.0 MMBtu/hr, one unit at 3.0 MMBtu/hr, and one unit at 5.4 MMBtu/hr which fire natural gas. The sulfur content of natural gas is negligible.

The make-up air handling units are not steam generating units. Therefore, they are not subject to NSPS Subpart Dc.

A summary of the BPT analysis for the make-up air handling units is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane), based on a thirteen 4-week rolling total.
2. Chapter 103 regulates PM emissions, however in this case a BPT analysis for PM determined a more stringent limit of 0.05 lb/MMBtu was appropriate and shall be used. The PM_{10} limits are derived from the PM limits.
3. NO_x, CO and VOC emission limits are based upon AP-42 data dated 2/98.
4. Visible emissions from the make-up air handling units shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

E. Production Equipment

Production equipment which utilizes natural gas includes: 9.2 MMBtu/hr and 7.6 MMBtu/hr high speed ovens, a 6.9 MMBtu/hr high speed bun oven, and a 1.4 MMBtu/hr English muffin griddle. Chemically leavened production lines which fire natural gas include a 3.3 MMBtu/hr cake oven, and two 1.3 MMBtu/hr donut fryers.

The high speed ovens, English muffin griddle, cake oven, and donut fryers are not steam generating units. Therefore, they are not subject to NSPS Subpart Dc.

VOC emissions from the chemically leavened product lines (cake oven and donut fryers) are negligible. Therefore, add on pollution control equipment was determined to be economically unjustified.

The significant VOC emission sources at the bakery are the two bread ovens, the bun oven, and the English muffin griddle. Uncontrolled emissions from the bread and bun ovens are calculated to average 75 pounds VOC per hour. The muffin griddle uncontrolled emissions are calculated to be 1.37 pounds VOC per hour. VOC emissions from the muffin griddle are very dilute. Because of the low annual emissions and the low VOC concentration in the muffin griddle gas stream, add on control equipment was determined to be economically unjustified.

Potential uncontrolled VOC emissions are calculated at 166, 166, and 109 tons per year for bread line 1, bread line 2, and bun line, respectively. VOC emissions were calculated using the BACT document assuming bakery formulas similar to existing bakery products produced at another bakery owned by Interstate Brands Corporation.

IBC has installed a catalytic oxidizer system (consisting of catalytic oxidizers #1 and #2) that is capable of a destruction efficiency of 92%. Catalytic oxidizer #1 controls emissions from Bread Oven #1, has a nominal capacity of 3,200 scfm, and a burner capacity of 0.8 MMBtu/hr. Catalytic oxidizer #2 controls emissions from Bread Oven #2 and the Bun Oven, has a nominal capacity of 5,000 scfm, and a maximum burner capacity of 1.25 MMBtu/hr. An uptime of 95% for the catalytic oxidizer's paramenter monitors was included in the original BACT analysis for this facility.

A summary of the BPT analysis for the Bread Oven #1, Bread Oven #2, Bun Oven, English Muffin Griddle, Cake Line Oven, and Donut Fryers #1 and #2 is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane) based on thirteen 4-week rolling totals.
2. PM and PM_{10} limits are based upon BPT.
3. NO_x and CO emission limits are based upon AP-42 data dated 2/98.
4. IBC shall capture and control emissions from Bread Oven #1 in catalytic oxidizer #1 to achieve a destruction efficiency of 92%.
5. IBC shall capture and control emissions from Bread Oven #2 and the Bun oven in catalytic oxidizer #2 to achieve a destruction efficiency of 92%.
6. Visible emissions from the Bread Oven #1, Bread Oven #2, Bun Oven, English Muffin Griddle, Cake Line Oven, and Donut Fryers #1 and #2 shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

F. Miscellaneous VOC emission Sources
Fugitive VOC emissions occur from label printing of packaged goods, lubricating oil used for the oven chains, and two parts washers used in bakery maintenance and garage areas.

BPT for the parts washers is operating the washers in accordance with Chapter 130 operational requirements.

VOC emissions from the lubricating oil are estimated to be 5 tons per year. BPT for lubricating oil emissions includes good housekeeping practices, keeping containers covered when not in use, and recordkeeping. Recordkeeping shall consist of recording the gallons of lubricating oil used including VOC percent by weight.

The label printing of packaged goods consists of the use of many small inkjet printers. Total VOC emissions from the inkjet printers is estimated to be 1.8 tons per year. BPT for VOC emissions from the inkjet printers is recordkeeping including gallons of ink, makeup fluid, and cleaning solution used indicating the percent VOC by weight.

G. Annual Emission Restrictions
IBC shall be restricted to the following annual emissions, based on a 12 month rolling total:

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

	PM	**PM_{10}**	**SO_2**	**NO_x**	**CO**	**VOC**
Natural Gas Firing	8.8	8.8	0.2	15.0	12.6	0.8
Process VOC	-	-	-	-	-	49.1
Total TPY	**8.8**	**8.8**	**0.2**	**15.0**	**12.6**	**49.9**

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

Pollutant	**Tons/Year**
PM	25
PM_{10}	25
SO_2	50
NO_x	100
CO	250

Based on the above total facility emissions, IBC is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-732-71-D-N subject to the following conditions:

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (Title 38 MRSA §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [MEDEP Chapter 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [MEDEP Chapter 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [MEDEP Chapter 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [MEDEP Chapter 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [MEDEP Chapter 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [MEDEP Chapter 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [MEDEP Chapter 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [MEDEP Chapter 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [MEDEP Chapter 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or

b. pursuant to any other requirement of this license to perform stack testing.

(ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

(iii) submit a written report to the Department within thirty (30) days from date of test completion.

[MEDEP Chapter 115]

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

(i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

(iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[MEDEP Chapter 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [MEDEP Chapter 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [MEDEP Chapter 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [MEDEP Chapter 115]

(16) Boilers

A. Boilers #1 and #2 shall fire only natural gas or propane. [MEDEP Chapter 115]

B. Emissions shall not exceed the following [MEDEP Chapter 115]:

Equipment		**PM**	**PM_{10}**	**NO_x**	**CO**	**VOC**
Boiler #1	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.42	0.42	0.84	0.71	0.05
Boiler #2	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.42	0.42	0.84	0.71	0.05

C. Visible emissions from Boilers #1 and #2 shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [MEDEP Chapter 101]

(17) Make-up Air Handling Units

A. All make-up air handling units shall fire only natural gas or propane. [MEDEP Chapter 115]

B. Emissions shall not exceed the following [MEDEP Chapter 115]:

Equipment		**PM**	**PM_{10}**	**NO_x**	**CO**	**VOC**
Make-up Air #1	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #2	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #3	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #4	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #5	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #6	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.50	0.50	1.00	0.84	0.06
Make-up Air #7	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.50	0.50	1.00	0.84	0.06
Make-up Air #8	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.15	0.15	0.30	0.25	0.02
Make-up Air #9	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.27	0.27	0.54	0.45	0.03

C. Visible emissions from the make-up air handing units shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [MEDEP Chapter 101]

(18) Yeast Leavened Process Source Emissions

A. Bread Oven #1, Bread Oven #2, the Bun Oven, and the English Muffin griddle shall fire only natural gas or propane. [MEDEP Chapter 115]

B. IBC shall capture and control emissions from Bread Oven #1 in catalytic oxidizer #1 whenever Bread Oven #1 is operating. [MEDEP Chapter 115]

C. IBC shall capture and control emissions from Bread Oven #2 in catalytic oxidizer #2 whenever Bread Oven #2 is operating. [MEDEP Chapter 115]

D. IBC shall capture and control emissions from the Bun Oven in catalytic oxidizer #2 whenever the Bun Oven is operating. [MEDEP Chapter 115]

E. Emissions shall not exceed the following [MEDEP Chapter 115]:

Equipment		**PM**	**PM_{10}**	**NO_x**	**CO**	**VOC**
Catalytic Oxidizer #1	lb/hr	2.00	2.00	1.20	0.25	N/A
Catalytic Oxidizer #2	lb/hr	2.00	2.00	1.70	0.39	N/A
English Muffin Griddle	lb/hr	0.20	0.20	0.14	0.03	1.50

F. Visible emissions from the catalytic oxidizers shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [MEDEP Chapter 101]

G. Visible emissions from the English Muffin Griddle shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [MEDEP Chapter 101]

H. IBC shall operate catalytic oxidizers #1 and #2 such that they each achieve a destruction efficiency of 92.0%. [MEDEP Chapter 115]

I. IBC shall conduct a compliance test of each catalytic oxidizer system to demonstrate the VOC destruction efficiency prior to June 30, 2004. Testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 25A or other method approved by the Department. IBC shall submit a test protocol to the Department at least 30 days prior to conducting the compliance test. A report containing the test results shall be submitted to the Department within 30 days of the completion of testing in accordance the Department's stack test protocol. [MEDEP Chapter 115]

J. IBC shall monitor and record the following as specified, for each catalytic oxidizer:

Parameter for Catalytic Oxidizer	Monitor	Record
inlet temperature to the catalytic oxidizer	continuously	continuously
outlet temperature from the catalytic oxidizer	continuously	continuously

Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 95% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. [MEDEP Chapter 115]

K. IBC shall perform annual core testing of the catalyst. [MEDEP Chapter 115]

L. IBC shall check temperature rise semi-annually for the highest emitting bread and/or roll variety in order to demonstrate that temperature rise is maintained as recommended by the oxidizer manufacturer. [MEDEP Chapter 115]

(19) Chemically Leavened Process Source Emissions

A. The Cake Oven and Donut Fryers #1 and #2 shall fire only natural gas or propone. [MEDEP Chapter 115]

B. Emissions shall not exceed the following [MEDEP Chapter 115]:

Equipment		PM	PM_{10}	NO_x	CO	VOC
Cake Oven	lb/hr	0.17	0.17	0.33	0.28	0.02
Donut Fryer #1	lb/hr	0.33	0.33	0.13	0.11	0.01
Donut Fryer #2	lb/hr	0.33	0.33	0.13	0.11	0.01

C. Visible emissions from the Cake Oven, Donut Fryer #1, and Donut Fryer #2 shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [MEDEP Chapter 101]

(20) Facility Emissions and Fuel Use Cap

A. Total fuel use for the facility shall not exceed 300 million scf/year (thirteen 4-week rolling total) of natural gas or propane equivalent. [MEDEP Chapter 115]

B. IBC shall not exceed a facility wide emission limit of 49.9 tons per year of VOC based on a thirteen 4-week rolling total. [MEDEP Chapter 115]

(21) Record keeping [MEDEP Chapter 115]
IBC shall keep the following records:

A. For the boilers, make-up air handling units, and production equipment, IBC shall maintain fuel use records or fuel purchase receipts (13 4-week rolling totals) for natural gas and propane indicating the quantity (scf or gallons) purchased and heat content of the natural gas and propane.

B. IBC shall maintain records and calculate total facility annual VOC emissions by recording yeast leavened product production, operation of the catalytic oxidizers, annual videojet ink purchased, annual oven chain lube oil purchased, annual parts washer solvent (gallons), and natural gas purchased such that the total facility VOC emissions on a annual rolling total (13 4-week totals) do not exceed 49.9 tons per year.

C. Yeast Leavened Production

1. IBC shall maintain records of baking production in each yeast leavened production line. Records shall include the following:

   a. initial yeast as a percent of flour;
   b. total fermentation time in hours (yeast action time);
   c. yeast spike as a percent of flour;
   d. spike time in hours;
   e. ethanol emission factor (lbs VOC/ton product); and
   f. total amount of product produced (production in tons).

2. IBC shall calculate and record total yeast leavened VOC emissions (tons) every 4 weeks.

D. Catalytic Oxidizer Parameter Monitoring

1. For the equipment parameter monitoring (catalytic oxidizer inlet and outlet temperature) and recording, required by this license, the licensee shall maintain records of the most current six year period and the records shall include:

   a. Documentation which shows monitor operational status during all source operating time, including specifics for calibration and audits;

   b. A complete data set of all monitored parameters as specified in this license. All parameter records shall be made available to the BAQ upon request;

   c. Records of the initial performance test and any subsequent test demonstrating the destruction efficiency of each catalytic oxidizer including the minimum inlet temperature to the oxidizer catalyst bed and initial destruction efficiency;

   d. Records of annual core testing of each oxidizer's catalyst; and

   e. Records shall be maintained of the oxidizers semi-annual temperature rise check. The semi-annual temperature rise check shall consist of testing temperature rise in the oxidizers while the highest emitting bread and/or roll variety is baking in order to demonstrate that temperature rise is maintained within an acceptable range as recommended by the oxidizer manufacturer during the initial performance test in order to maintain a 92% destruction efficiency.

E. Oven Chain Lubricant

IBC shall maintain annual records of gallons of oven chain lubricant purchased. Records shall indicate the VOC percent by weight and total VOC emissions in tons per year.

F. Videojet Printer Ink

IBC shall maintain annual records of gallons of videojet printer ink, makeup fluid, and cleaning solution purchased. Records shall indicate the VOC percent by weight and total VOC emissions in tons per year.

G. Parts Washer

IBC shall maintain records of gallons of solvent added and removed for disposal from the parts washers indicating VOC percent by weight and total VOC emissions emitted in tons per year.

(22) **Parts Washers** [MEDEP Chapter 130]

The parts washers are subject to the operational and record keeping requirements of MEDEP Chapter 130 which include, but are not limited to, the following:

A. IBC shall keep records of the amount of solvent added to each parts washer. [MEDEP Chapter 130]

B. IBC shall equip each cold cleaning degreaser with a cover that is easily operated with one hand if [MEDEP Chapter 130]:
   1. the solvent vapor pressure is greater than 15 millimeters of mercury measured at 100 ^{o}F by ASTM D323-89; or,
   2. the solvent is agitated; or,
   3. the solvent is heated.

C. IBC shall attach a permanent conspicuous label to each unit summarizing the following operational standards [MEDEP Chapter 130]:
   1. Close the covers (if required by (1) above) on all solvent degreasing tanks when the tanks are not in use;
   2. Drain the cleaned parts for at least fifteen (15) seconds or until dripping stops;
   3. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized or shower-type spray) at a pressure that does not exceed ten (10) pounds per square inch gauge pressure (psig);
   4. Do not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
   5. Minimize drafts to less than 40 meters/minute; and
   6. Refrain from operating the cold cleaning degreaser upon the occurrence of any visible solvent leak until such leak is repaired.

D. IBC shall not use any halogenated solvents in the degreasing tanks. [MEDEP Chapter 115, BPT]

(23) IBC shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C).

(24) **Annual Emission Statement**
In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

1) A computer program and accompanying instructions supplied by the Department;

   or

2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

The emission statement must be submitted by September 1 or as otherwise specified in Chapter 137.

(25) IBC shall pay the annual air emission license fee within 30 days of June 30th of each year. Pursuant to 38 M.R.S.A. Section 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 M.R.S.A. Section 341-D, Subsection 3.

(26) IBC shall submit a complete application for renewal of this license to the Department no later than DATE. Should IBC fail to submit a complete application for renewal by this date, the facility may be deemed to be operating without a license and subject to enforcement action. [MEDEP Chapter 115]

(27) The term of this Order shall be for five (5) years from the signature below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 10/14/03
Date of application acceptance: 10/15/03

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.